

1 **DAVID M.C. PETERSON**  
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11 UNITED STATES MAGISTRATE COURT  
12 SOUTHERN DISTRICT OF CALIFORNIA

13 (HONORABLE ANTHONY J. BATTAGLIA)

14 UNITED STATES OF AMERICA, ) Case No. 08cr01180-WQH  
15 Plaintiff, )  
16 v. ) **AMENDED JOINT MOTION TO CONTINUE  
17 JUAN RICARDO FLORES-SUAREZ, ) CHANGE OF PLEA HEARING**  
18 )  
19 Defendant. )  
20 \_\_\_\_\_)

21 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY;  
22 DOUGLAS KEEHN, ASSISTANT UNITED STATES ATTORNEY:

23 IT IS HEREBY REQUESTED by the parties in the case, the defendant, Juan Ricardo Flores-Suarez,  
24 by and through his counsel, David M.C. Peterson, Esq., and plaintiff, United States of America, by and  
25 through its counsel, Karen P. Hewitt, United States Attorney, and Douglas Keehn, Assistant United States  
26 Attorney, and that the change of plea hearing in the above entitled case scheduled for Thursday, April 24,  
27 2008 at 1:30 p.m., be continued to Thursday, May 1, 2008 at 9:00 a.m.

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1 Undersigned defense counsel called the court's judicial assistant to obtain the new motion hearing date.  
2 A proposed order with respect to this joint motion is being submitted directly to the court via  
3 efile\_battaglia@casd.uscourts.gov.

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5 **CONCLUSION**

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7 Respectfully submitted,

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10 Dated: April 22, 2008

11 */s/ David M.C. Peterson*  
**DAVID M.C. PETERSON**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Haynes

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13 Dated: April 22, 2008

14 */s/ Douglas Keehn*  
**DOUGLAS KEEHN**  
Assistant United States Attorney

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**CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing is true and accurate to the best information and belief, and that a copy of the foregoing document has been caused to be delivered this day upon:

Courtesy Copy to Chambers

Copy to Assistant U.S. Attorney via ECF NEF

## Copy to Defendant

Dated: April 23, 2008

/s/ DAVID M. PETERSON  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Flores-Suarez  
david.peterson@fd.org (email)

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